

07/24/2019

JULIA C. DUDLEY, CLERK  
BY: *H. Whelan*  
DEPUTY CLERK

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
CHARLOTTESVILLE DIVISION

IN THE MATTER OF THE SEARCH OF  
CELLULAR TELEPHONE 434-466-3995,  
KNOWN TO BE ASSOCIATED WITH  
IMEI NUMBERS 354839093242769,  
359301063468135, AND 359236061276611,  
BELONGING TO ROY CHAPMAN  
CORRELL

Case No. 3:19mj00046

**Filed Under Seal**

**AFFIDAVIT IN SUPPORT OF**  
**AN APPLICATION FOR A SEARCH WARRANT**

I, David Wolf, a Special Agent with the Federal Bureau of Investigation, being duly sworn,  
depose and state as follows:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent (SA) with the Federal Bureau of Investigation (FBI) and have been so employed since 2013. I am currently assigned to the FBI Richmond, Virginia (VA), Field Office, Charlottesville Resident Agency. As part of my duties as an FBI SA, I have investigated criminal violations relating to domestic and international terrorism, civil rights, violent gangs, drugs, and crimes against children. I have received training and gained experience in interviewing and interrogation techniques, arrest procedures, search warrant applications, the execution of searches and seizures, computer crimes, computer evidence identification, child pornography identification, computer evidence seizure and processing, and various other criminal laws and procedures.

2. This affidavit is submitted in support of applications for a search warrant pursuant to Rule 41 of the Rules of Criminal Procedure for cellular phone number (hereafter, "SUBJECT

PHONE”) **434-466-3995**, known to be associated with IMEIs 354839093242769, 359301063468135, and 359236061276611 for contraband and evidence, fruits, and instrumentalities of violations of Title 18, United States Code, Sections 2252A(a)(2)(A) and 2252A(a)(5)(B) which items are more specifically described in Attachment B of this affidavit.

3. The statements contained in this affidavit are based in part on: information provided by FBI Special Agents; written reports about this and other investigations that I have received, directly or indirectly, from other law enforcement agents, information gathered from the service of administrative subpoenas; the results of physical and electronic surveillance conducted by law enforcement agents; independent investigation and analysis by FBI agents/analysts and computer forensic professionals; and my experience, training and background as a Special Agent with the FBI. Since this affidavit is being submitted for the limited purpose of securing a search warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are necessary to establish probable cause to believe that contraband and evidence, fruits, and instrumentalities of violations of Title 18, United States Code, Sections 2252A(a)(2)(A) and 2252A(a)(5)(B) are presently stored on the SUBJECT PHONE.

#### **STATUTORY AUTHORITY**

4. As noted above, this investigation concerns alleged violations of the following:
- a. Title 18, United States Code, Sections § 2252A(a)(2)(A) and (b)(1) prohibits a person from knowingly receiving or distributing, or attempting or conspiring to receive or distribute, any child pornography or any material that contains child pornography, as defined in 18 U.S.C. § 2256(8), that has been mailed, or using any means or facility of interstate or foreign commerce shipped or transported in or affecting interstate or foreign commerce by any means, including by computer.

- b. Title 18, United States Code, Sections 2252A(a)(5)(B) and (b)(2) prohibits a person from knowingly possessing or knowingly accessing with intent to view, or attempting or conspiring to do so, any material that contains an image of child pornography, as defined in 18 U.S.C. § 2256(8), that has been mailed, or shipped or transported using any means or facility of interstate or foreign commerce or in or affecting interstate or foreign commerce by any means, including by computer, or that was produced using materials that have been mailed or shipped or transported in or affecting interstate or foreign commerce by any means, including by computer.

### **DEFINITIONS**

5. The following definitions apply to this Affidavit and Attachment B to this Affidavit:

- a. **“Illicit sexual conduct”** means, in relevant part, a sexual act (as defined in section 2246), with a person under 18 years of age that would be in violation of chapter 109A if the sexual act occurred in the special maritime and territorial jurisdiction (SMTJ) of the United States. Under 18 U.S.C. § 2243, an offense under Chapter 109A, it is a crime for a person to knowingly engage, or attempt to engage, in a sexual act, as defined in 18 U.S.C. § 2246(2) with someone who has attained the age of 12 but not 16, when the minor is at least four years younger than the offender (in the SMTJ). Under 18 U.S.C. § 2244(a)(3), another Chapter 109A offense, it is a crime to engage in “sexual contact,” as defined in 18 U.S.C. 2246(3), with a minor, at least four years younger who is between 12 and 15 years of age in the SMTJ.

- b. “**Child Pornography**” includes the definition in Title 18 U.S.C. § 2256(8) (any visual depiction of sexually explicit conduct where (a) the production of the visual depiction involved the use of a minor engaged in sexually explicit conduct, (b) the visual depiction is a digital image, computer image, or computer-generated image that is, or is indistinguishable from, that of a minor engaged in sexually explicit conduct, or (c) the visual depiction has been created, adapted, or modified to appear that an identifiable minor is engaged in sexually explicit conduct).
- c. “**Visual depictions**” include undeveloped film and videotape, and data stored on computer disk or by electronic means, which is capable of conversion into a visual image. *See* 18 U.S.C. § 2256(5).
- d. “**Minor**” means any person under the age of eighteen years. *See* 18 U.S.C. § 2256(1).
- e. “**Sexually explicit conduct**” means actual or simulated (a) sexual intercourse, including genital-genital, oral-genital, anal-genital, or oral-anal, whether between persons of the same or opposite sex; (b) bestiality; (c) masturbation; (d) sadistic or masochistic abuse; or (e) lascivious exhibition of the genitals or pubic area of any person. *See* 18 U.S.C. § 2256(2).
- f. The terms “**records**,” “**documents**,” and “**materials**,” as used herein, include all information recorded in any form, visual or aural, and by any means, whether in handmade form (including, but not limited to, writings, drawings, painting), photographic form (including, but not limited to, microfilm, microfiche, prints, slides, negatives, videotapes, motion pictures, photocopies), mechanical form (including, but not limited to, phonograph records, printing, typing) or electrical,

electronic or magnetic form (including, but not limited to, tape recordings, cassettes, compact discs, electronic or magnetic storage devices such as floppy diskettes, hard disks, CD-ROMs, digital video disks (DVDs), Personal Digital Assistants (PDAs), Multi Media Cards (MMCs), memory sticks, optical disks, printer buffers, smart cards, memory calculators, electronic dialers, or electronic notebooks, VHS tapes, mini-cassette tapes, as well as digital data files and printouts or readouts from any magnetic, electrical or electronic storage device).

#### **CHARACTERISTICS OF COLLECTORS OF CHILD PORNOGRAPHY**

6. Based upon my knowledge, experience, and training in child pornography investigations, and the training and experience of other law enforcement officers with whom I have had discussions, there are certain characteristics common to individuals involved in the collection of child pornography (hereafter “Collectors”).

7. Collectors may receive sexual stimulation and satisfaction from contact with children, or from having fantasies of children engaged in sexual activity or suggestive poses, or from literature describing such activity.

8. Collectors may collect sexually explicit or suggestive materials in a variety of media, including photographs, magazines, motion pictures, videotapes, books, slides and/or drawings or other visual media. Collectors typically use these materials for their own sexual arousal and gratification. Collectors often have companion collections of child erotica. Child erotica are materials or items that are sexually suggestive and arousing to pedophiles, but which are not in and of themselves obscene or pornographic. Such items may include photographs of clothed children, drawings, sketches, fantasy writings, diaries, pedophilic literature and sexual aids.

9. Collectors who also actively seek to engage in sexual activity with children may use these materials to lower the inhibitions of a child they are attempting to seduce, convince the child of the normalcy of such conduct, sexually arouse their selected child partner, or demonstrate how to perform the desired sexual acts.

10. Collectors may possess and maintain their “hard copies” of child pornographic images and reference materials (e.g., mailing and address lists) in a private and secure location. With the growth of the Internet and computers, a large percentage of most collections today are in digital format. Typically these materials are kept at the Collector’s residence for easy access and viewing. Collectors usually place high value on their materials because of the legal and social danger associated with acquiring them. As a result, it is not uncommon for Collectors to hoard and retain child pornography for long periods of time, even for years.

11. Collectors prefer not to be without their child pornography for any prolonged time period. This behavior has been documented by law enforcement officers involved in the investigation of child pornography throughout the world.

12. Producers of child pornography are even more likely to keep images or videos that they have created. This is because while pornographic images of anonymous images could possibly be replaced with images of other anonymous children, such as when “culling” a collection to improve the overall quality, images and videos of sexual acts depicting both the individual and known children are irreplaceable. Based upon my knowledge, training, and experience, producers of child pornography rarely, if ever, delete child pornography from a private collection.

### **BACKGROUND AND USE OF “DROPBOX”**

13. Dropbox Inc. is a file hosting and sharing service operated by Dropbox Inc., which

is headquartered in San Francisco, California and is an electronic communication service, as defined in 18 U.S.C. § 2510(15), and/or a remote computer service, as defined in 18 U.S.C. § 2711(2). Dropbox.com offers to its users cloud storage, file synchronization, personal cloud, and client software. Online storage mediums, such as Dropbox, make it possible for user to have access to saved files without the requirement of storing said files on their own computer or other electronic storage devices. A Dropbox user can store digital files within a special folder on the user's computing device, and these files can be synchronized so the same folder with all the same digital content is accessible on each of the user's other computing devices which have the Dropbox application installed and synched with the user's account. Files placed in these folders may be accessed through the Dropbox website and through desktop and mobile device applications.

14. Dropbox users can share access to their digital files with others by using the built in option to create URL hyperlinks to their Dropbox accounts (hereafter "links") and sending said links through email, chat functions on various online or cellular applications or social media accounts. Dropbox users can also allow others to upload and download digital files stored within specific shared folders in the user's account. Dropbox has desktop applications as well as mobile applications for Android, and iOS devices. Dropbox collects information like the user's name, email address, phone numbers, payment info, and physical address. Dropbox also collects IP addresses for the devices accessing the account, the type of browser, device used, as well as identifiers associated with the user's devices.

15. In some cases, Dropbox account users will communicate directly with Dropbox about issues relating to the account, such as technical problems, billing inquiries, or complaints from other users. Online storage providers typically retain records about such communications, including records of contacts between the user and the provider's support services, as well records

of any actions taken by the provider or user as a result of the communications.

### **BACKGROUND AND USE OF THE “KIK MESSENGER”**

16. Kik Messenger, also known as “Kik,” is a popular free instant messenger application (app) for mobile devices (i.e. smart cell phones, tablets, iPods, etc.) from the Canadian company, Kik Interactive, which was founded in 2009. Kik is available on several mobile device platforms including, iOS, Android, and Windows Phone operating systems. The Kik application can be located through Google’s “Play Store,” and Apples “App Store.” The Kik application utilizes the internet connection through the mobile devices’ data plan or through Wi-Fi, to transmit and receive messages, photos, videos, sketches, mobile webpages, and other content transmitted by through the Kik application. Kik allows its users to register an user account without providing a telephone number, and prevents users from being located on the service through any information other than their chosen unique Kik username.

17. After locating the Kik application and downloading the application to the mobile device, the application requests permission to access the following data on the mobile device during the installation process: in-app purchases, identity, contacts, location, photos/media/files, camera, microphone, device ID & call information. Once given permission by the user, the Kik application installs itself on the mobile device. After installing the Kik app on the mobile device and initializing the Kik application for the first time, the potential user is required to establish a Kik account and is prompted to select the “SIGN UP” option. While establishing a Kik account, the potential user is prompted to provide information, including the user’s “First Name,” “Last Name,” and “Birthday.” The potential user is prompted to create a “Kik Username,” (which is the only information that is required to be unique,) and is prompted to provide an “Email address.”



The information provided by the potential user is used to establish a Kik account; however, this user information is not verified and the information can be completely fictitious (except for the uniqueness of the Kik username). A “verification email” is sent by Kik to the user’s provided email address and the user is prompted to verify the email address. Verification of the user’s email address is not required and does not prevent the user from utilizing the application if not verified. The potential Kik user is prompted to provide a user profile picture, which can either be taken using the mobile device’s camera feature or uploaded from the device photo gallery. However, the lack of a profile picture does not prevent the user from utilizing the application. The Kik username is created by the user and is the only information that is required to be unique.

18. At the completion of the account registration, the user is allowed to start communicating with other Kik users. Searching for specific Kik users can only be performed using the Kik user’s registered “username;” searches by phone number or email address cannot be performed. Entering the unique Kik username through the application’s search field yields potential matches in which the user simply selects the Kik user to start communicating with that specific user.

19. In today’s world where mobile phones are the technology of choice for millions of people to communicate, chat applications like Kik Messenger are often used to communicate with others, and on occasions are used during the commission of crimes, like the online harassment and bullying of juveniles, and the sexual exploitation of minors. Mobile devices which utilize social media and communication applications, store, or “cache,” certain data from the social media or communication applications directly on the mobile device and this data can be recovered by a forensic expert. The Kik Messenger application is no different.

20. For both iOS and Android devices, most Kik artifacts relevant to criminal

investigations are stored within specific databases located in specific locations on the mobile devices. These databases store details concerning the Kik users' contacts, messages, and attachments sent and received through the Kik Messenger application. These databases contain such data as the usernames and display names for each contact, but are not limited to this type of information. The Kik username is a unique identifier for each and every Kik user and this type of data is valuable in criminal investigations. The Kik contact database can also contain profile picture links and timestamps, as well as group and block lists. This data can be recovered from the mobile device by trained computer experts.

21. Messages, including any attached image files, are stored within a specific location on the mobile device, depending on the device used. As Kik stores all of its data in this specific location within the mobile device, in an unencrypted format, there is a good chance that the entire messaging history, if not a partial message history, can be recovered by trained computer experts and used during investigations.

22. Users sometimes delete their conversation histories by clearing the Kik Messenger logs. However, since the Kik messaging databases are not wiped or erased immediately (depending on the operating system of the mobile device), these deleted records end up being stored in a specific location in a specific format on the mobile device. These deleted records may be kept for a period of time until the database reclaims the space to store new records. A forensic expert has the ability to recover such records which could prove useful in various investigations.

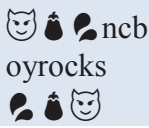
23. Sometimes, a user will attempt to destroy evidence by deleting the database file completely. While there is nothing that can be done to recover this information from an iOS device (the operating system does not allow for the recovery of anything that has been deleted), carving Android and chip-off dumps may return an amazingly high amount of deleted evidence.

## PROBABLE CAUSE

24. Following an undercover operation, an individual known to be utilizing Kik, “SUBJECT 1”, was identified. On March 1, 2018, SUBJECT 1 was located at his residence and agreed to speak with law enforcement. SUBJECT 1 admitted to utilizing Kik username “ncboyrocks.” SUBJECT 1 admitted to placing advertisements on sexting forums looking for younger males in North Carolina and engaging in sexual activity with a minor under the age of sixteen. During the course of this conversation, SUBJECT 1 admitted to receiving Dropbox links containing child pornography from others and then distributing the links. He also admitted to possessing a list of links saved within the “notes” application on his mobile device. Based on the context of the conversation, law enforcement understood SUBJECT 1 to mean that he was receiving and distributing Dropbox links containing child pornography imagery to other users of the Dropbox platform and that said links were contained in the “notes” application.

25. A review of SUBJECT 1’s Kik Messenger communications revealed that he and other Kik Messenger users discussed exchanging Dropbox “links” containing digital files depicting child pornography, one such Kik Messenger user was “darren.boy”.

26. On September 24, 2017, SUBJECT 1 had the following conversation on Kik Messenger with Kik user “darren.boy”, who stated, *inter alia*, that he resides in Charlottesville, Virginia :

1		Incoming	You started chatting with Darren
2	ncboyrocks 	Outgoing	Hey!
3	ncboyrocks	Outgoing	I have links

	   ncb oyrocks   		
4	ncboyrock s    ncb oyrocks   	Outgoin g	Of young and older!
5	ncboyrock s    ncb oyrocks   	Outgoin g	I can send all my links in exchange of yours. How many do you have?
6	darren.boy Darren Hall	Incomin g	Hey
7	darren.boy Darren Hall	Incomin g	Idk a lot
8	ncboyrock s    ncb oyrocks   	Outgoin g	Ok haha 23 here btw
9	ncboyrock s    ncb oyrocks   	Outgoin g	You?
1 0	darren.boy Darren Hall	Incomin g	19
1 1	ncboyrock s    ncb oyrocks   	Outgoin g	Lets start by sending one link each then all of them, sounds good?
1 2	darren.boy Darren Hall	Incomin g	Yeah you first
1 3	darren.boy Darren Hall	Incomin g	Where in NC are you from?

1 4	ncboyrock s    ncb oyrocks   	Outgoin g	<a href="https://www.dropbox.com/sh/6wkuecjwq62k7js/AAB7UuYbQMocYwGMkZNL9wPya/">https://www.dropbox.com/sh/6wkuecjwq62k7js/AAB7UuYbQMocYwGMkZNL9wPya/</a>
1 5	ncboyrock s    ncb oyrocks   	Outgoin g	Chapel hill
1 6	ncboyrock s    ncb oyrocks   	Outgoin g	What about you?
1 7	darren.boy Darren Hall	Incomin g	VA
1 8	darren.boy Darren Hall	Incomin g	You have younger?
1 9	darren.boy Darren Hall	Incomin g	And kinky 😊
2 0	ncboyrock s    ncb oyrocks   	Outgoin g	Nice where in VA?
2 1	ncboyrock s    ncb oyrocks   	Outgoin g	I will just send all I got lol but can you send yours too



2	ncboyrock	Outgoing	Links:
2	s   ncb oyrocks   		<a href="https://www.dropbox.com/sh/gkc6ahwwsviqmyk/AABw_LYNWvyKGwtNgYvXoSmXa">https://www.dropbox.com/sh/gkc6ahwwsviqmyk/AABw_LYNWvyKGwtNgYvXoSmXa</a>  <a href="https://www.dropbox.com/sh/uniyzwueiqmgrcu/AAAjD3IbFD2nl4hoHpTQV9GUa?dl=0">https://www.dropbox.com/sh/uniyzwueiqmgrcu/AAAjD3IbFD2nl4hoHpTQV9GUa?dl=0</a>  <a href="https://www.dropbox.com/sh/6wkuecjwq62k7js/AAB7UuYbQMocYwGMkZNL9wPya/">https://www.dropbox.com/sh/6wkuecjwq62k7js/AAB7UuYbQMocYwGMkZNL9wPya/</a>  <a href="https://www.dropbox.com/sh/u8j1t65u16wwu6k/AABPCq2Bz1NJ2ZDFGB9eE956a/?dl=0">https://www.dropbox.com/sh/u8j1t65u16wwu6k/AABPCq2Bz1NJ2ZDFGB9eE956a/?dl=0</a>  <a href="https://www.dropbox.com/sh/7ojzo1y7e89yhja/AAAtbMWIW29ACZHqGsfRcaFKa?dl=0">https://www.dropbox.com/sh/7ojzo1y7e89yhja/AAAtbMWIW29ACZHqGsfRcaFKa?dl=0</a>  <a href="https://www.dropbox.com/sh/9jb1e6llmmrgkjc/AABNsf-_mbhGtan9u5nUCpUPa?dl=0">https://www.dropbox.com/sh/9jb1e6llmmrgkjc/AABNsf-_mbhGtan9u5nUCpUPa?dl=0</a>  <a href="https://www.dropbox.com/sh/eh2spk4ocddkjpn/AAD4SRQvPgZibMGF1soPp-pBa?dl=0">https://www.dropbox.com/sh/eh2spk4ocddkjpn/AAD4SRQvPgZibMGF1soPp-pBa?dl=0</a>
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













































2	darren.boy	Incomin	<a href="https://www.dropbox.com/sh/eb0xigrorfvw76h/AACs-JzAOmiRfaJ_0491FVBEa/?dl=0">https://www.dropbox.com/sh/eb0xigrorfvw76h/AACs-JzAOmiRfaJ_0491FVBEa/?dl=0</a>
3	Darren Hall	g	<a href="https://www.dropbox.com/sh/7qeo1zo8nrflsi9/AACkcsyHuT8ZXq7awy-IwIwGa/?dl=0">https://www.dropbox.com/sh/7qeo1zo8nrflsi9/AACkcsyHuT8ZXq7awy-IwIwGa/?dl=0</a>  Links 6, 1 <a href="https://www.dropbox.com/sh/biyapdwsz5x9v3x/AABPyVnjKQsAo4vnWXGcbVXqa?dl=0">https://www.dropbox.com/sh/biyapdwsz5x9v3x/AABPyVnjKQsAo4vnWXGcbVXqa?dl=0</a>  3 <a href="https://www.dropbox.com/sh/7795rh9nx9r8ccw/AABXjrDqQPqEebs9RL63iaZza?dl=0">https://www.dropbox.com/sh/7795rh9nx9r8ccw/AABXjrDqQPqEebs9RL63iaZza?dl=0</a>  8 <a href="https://www.dropbox.com/sh/6wkuecjwq62k7js/AAB7UuYbQMocYwGMkZNL9wPya/">https://www.dropbox.com/sh/6wkuecjwq62k7js/AAB7UuYbQMocYwGMkZNL9wPya/</a>  13 <a href="https://www.dropbox.com/sh/f93rxadduqsxm6b/AAByz6onC9MXSbemvzSp6kVba?dl=0">https://www.dropbox.com/sh/f93rxadduqsxm6b/AAByz6onC9MXSbemvzSp6kVba?dl=0</a>  14 <a href="https://www.dropbox.com/sh/czcyuyodvx42cm7/AADD98AttLKgrWIDP3Tz7PsVa?dl=0">https://www.dropbox.com/sh/czcyuyodvx42cm7/AADD98AttLKgrWIDP3Tz7PsVa?dl=0</a>  16 <a href="https://www.dropbox.com/sh/yh2uoah3m0qrdl/AAAc3FiH-n222JxjnD7kbYfMa?dl=0">https://www.dropbox.com/sh/yh2uoah3m0qrdl/AAAc3FiH-n222JxjnD7kbYfMa?dl=0</a>  <a href="https://www.dropbox.com/sh/nw7ccfdh6xzvqc2/AAC-5qCDhuWYYLI3V1bpJ9F5a/?dl=0">https://www.dropbox.com/sh/nw7ccfdh6xzvqc2/AAC-5qCDhuWYYLI3V1bpJ9F5a/?dl=0</a>  <a href="https://www.dropbox.com/sh/1999xp6fex0dj0a/AABSqVM14dRC_VTc0Vwrznfaa/?dl=0">https://www.dropbox.com/sh/1999xp6fex0dj0a/AABSqVM14dRC_VTc0Vwrznfaa/?dl=0</a>  <a href="https://www.dropbox.com/sc/v9a21stbm1eo30m/AACbfI2PfYcI6iXa4pR3mqhAa/">https://www.dropbox.com/sc/v9a21stbm1eo30m/AACbfI2PfYcI6iXa4pR3mqhAa/</a>  <a href="https://www.dropbox.com/s/be989uuncclcsyt1/BWVIP108.mp4?dl=0">https://www.dropbox.com/s/be989uuncclcsyt1/BWVIP108.mp4?dl=0</a>  <a href="https://www.dropbox.com/sh/d00r0vnoycyrhy4/AAAvnL9VXgkwd9yLyLgje0SWa/New?dl=0">https://www.dropbox.com/sh/d00r0vnoycyrhy4/AAAvnL9VXgkwd9yLyLgje0SWa/New?dl=0</a>

			<a href="https://www.dropbox.com/sh/1ievonvaguh71lf/AADacoWYyVF9ujHSD4JcqEMta?dl=0">https://www.dropbox.com/sh/1ievonvaguh71lf/AADacoWYyVF9ujHSD4JcqEMta?dl=0</a>  <a href="https://www.dropbox.com/sh/5rq1c8gs8o90g2l/AADWw8ZPYLRKjdz60e9vWBa9a#">https://www.dropbox.com/sh/5rq1c8gs8o90g2l/AADWw8ZPYLRKjdz60e9vWBa9a#</a>
2 4	ncboyrock s   ncb oyrocks  	Outgoi ng	Links 5: <a href="https://www.dropbox.com/sh/fs9aip4aocug30f/AACfpyo2wB2ksPPtuUq1kUNDa?dl=0">https://www.dropbox.com/sh/fs9aip4aocug30f/AACfpyo2wB2ksPPtuUq1kUNDa?dl=0</a>  <a href="https://www.dropbox.com/sh/hbbbommwn9si4x9/AAAQYe-1n3-Kns53Efvi6qOIa?dl=0">https://www.dropbox.com/sh/hbbbommwn9si4x9/AAAQYe-1n3-Kns53Efvi6qOIa?dl=0</a>  <a href="https://www.dropbox.com/sh/7v7uf6nwus4tesu/AADr3HolJxiiVHXsf2AT3OwGa?dl=0">https://www.dropbox.com/sh/7v7uf6nwus4tesu/AADr3HolJxiiVHXsf2AT3OwGa?dl=0</a>  <a href="https://www.dropbox.com/sh/44y1n07fxwyr17y/AABCvm9a8G7AyfHnFgVCAUNta?dl=0">https://www.dropbox.com/sh/44y1n07fxwyr17y/AABCvm9a8G7AyfHnFgVCAUNta?dl=0</a>  <a href="https://www.dropbox.com/sh/xce9ev2sfcqsja0/AABHIRU4cNF304QcI3wvElmQa?dl=0">https://www.dropbox.com/sh/xce9ev2sfcqsja0/AABHIRU4cNF304QcI3wvElmQa?dl=0</a>
2 5	ncboyrock s	Outgoi ng	That's all I got! Enjoy! ;) :)

	   ncb oyrocks   		
2 6	ncboyrock s    ncb oyrocks   	Outgoin g	And have you mess with young boys yet? ;)
2 7	darren.boy Darren Hall	Incomin g	I did when I was younger
2 8	darren.boy Darren Hall	Incomin g	Does that count
2 9	ncboyrock s    ncb oyrocks   	Outgoin g	Nice
3 0	ncboyrock s    ncb oyrocks   	Outgoin g	Haha
3 1	ncboyrock s    ncb oyrocks   	Outgoin g	How old was the guy?
3 2	darren.boy Darren Hall	Incomin g	We were both 5
3 3	ncboyrock s    ncb oyrocks   	Outgoin g	Lol young young
3 4	ncboyrock s    ncb oyrocks   	Outgoin g	Cute

3 5	darren.boy Darren Hall	Incomin g	We'd take turns sitting on each other's faces
3 6	ncboyrock s 🐱🐱🐱ncb oyrocks 🐱🐱🐱	Outgoin g	Mm hot
3 7	ncboyrock s 🐱🐱🐱ncb oyrocks 🐱🐱🐱	Outgoin g	I also had fun when little
3 8	ncboyrock s 🐱🐱🐱ncb oyrocks 🐱🐱🐱	Outgoin g	From like 8-14 lol
3 9	ncboyrock s 🐱🐱🐱ncb oyrocks 🐱🐱🐱	Outgoin g	With a female cousin
4 0	darren.boy Darren Hall	Incomin g	Hot I tried to fuck my cousin but he didn't want to
4 1	ncboyrock s 🐱🐱🐱ncb oyrocks 🐱🐱🐱	Outgoin g	But also had like 2 male friends we touched each other. But i actually sucked cock at 19 lol
4 2	darren.boy Darren Hall	Incomin g	When I was 16 I hooked up with a 22yo
4 3	ncboyrock s 🐱🐱🐱ncb oyrocks 🐱🐱🐱	Outgoin g	A lot of your links don't open :P you need to erase those before you send all you got!
4 4	ncboyrock s 🐱🐱🐱ncb oyrocks 🐱🐱🐱	Outgoin g	Nice!!

4 5	darren.boy Darren Hall	Incomin g	Yeah sorry they were someone else's
4 6	ncboyrock s    ncb oyrocks   	Outgoin g	I had something with a 14 yr old for my first time doing under age  .
4 7	ncboyrock s    ncb oyrocks   	Outgoin g	It was really hot
4 8	ncboyrock s    ncb oyrocks   	Outgoin g	But he didn't really bottom he tried lol
4 9	ncboyrock s    ncb oyrocks   	Outgoin g	It was fun! It was my fantasy haha
5 0	darren.boy Darren Hall	Incomin g	Sounds awesome
5 1	darren.boy Darren Hall	Incomin g	I would but I'm scared I'll get caught
5 2	darren.boy Darren Hall	Incomin g	Did you record it?
5 3	ncboyrock s    ncb oyrocks   	Outgoin g	No i don't record lol
5 4	ncboyrock s    ncb oyrocks   	Outgoin g	You won't get caught!
5 5	ncboyrock s	Outgoin g	You just need to go all for it

	   ncb oyrocks   		
5 6	ncboyrock s    ncb oyrocks   	Outgoin g	And go when he is home alone!
5 7	darren.boy Darren Hall	Incomin g	Can I see your cock pedo Sensei
5 8	ncboyrock s    ncb oyrocks   	Outgoin g	
5 9	ncboyrock s    ncb oyrocks   	Outgoin g	You now;)
6 0	darren.boy Darren Hall	Incomin g	
6 1	ncboyrock s    ncb oyrocks   	Outgoin g	Nice cock as well
6 2	ncboyrock s    ncb oyrocks   	Outgoin g	Yum
6 3	ncboyrock s    ncb oyrocks   	Outgoin g	Would love to suck it and swallow
6 4	ncboyrock s    ncb oyrocks   	Outgoin g	Any fetishes?

6 5	darren.boy Darren Hall	Incomin g	I like young and boys who like it as well
6 6	darren.boy Darren Hall	Incomin g	And I've always wanted to watch rape videos with someone
6 7	ncboyrock s 🐱🐼🐼ncb oyrocks 🐼🐼🐱	Outgoin g	Oh cool about the same! For me is not more about the penetration to be honest when it comes to young boys but more like i think is cute and want to spoil young naughty boys and cuddle and stuff.
6 8	ncboyrock s 🐱🐼🐼ncb oyrocks 🐼🐼🐱	Outgoin g	I also love to watch rape porn on occasion it turns me on
6 9	darren.boy Darren Hall	Incomin g	Yeah I just like their butts 😊
7 0	darren.boy Darren Hall	Incomin g	You got any good vids?
7 1	ncboyrock s 🐱🐼🐼ncb oyrocks 🐼🐼🐱	Outgoin g	Yeah so tight and virgin mm
7 2	ncboyrock s 🐱🐼🐼ncb oyrocks 🐼🐼🐱	Outgoin g	Not really for rape porn
7 3	ncboyrock s 🐱🐼🐼ncb oyrocks 🐼🐼🐱	Outgoin g	:/
7 4	darren.boy Darren Hall	Incomin g	Me either
7 5	darren.boy Darren Hall	Incomin g	I've seen some but I deleted it

7 6	darren.boy Darren Hall	Incomin g	Are you ever worried about getting caught on here?
7 7	ncboyrock s    oyrocks   	Outgoin g	Why on here? Not really. I delete conversations or close account open again and all conversations gone
7 8	darren.boy Darren Hall	Incomin g	Dudes send me fake messages like "this is the FBI" all the time but nothing has happened
7 9	ncboyrock s    oyrocks   	Outgoin g	But of course the history stays in kik forever is my understanding. Who knows
8 0	ncboyrock s    oyrocks   	Outgoin g	I never gotten that lol
8 1	darren.boy Darren Hall	Incomin g	Yeah idk there's too many people on here to get caught
8 2	ncboyrock s    oyrocks   	Outgoin g	Im not mean to anyone so i hopefully that works
8 3	ncboyrock s    oyrocks   	Outgoin g	Lol
8 4	darren.boy Darren Hall	Incomin g	Yeah that's good
8 5	darren.boy Darren Hall	Incomin g	What's your fav video you've watched?
8 6	ncboyrock s   	Outgoin g	Don't worry too much dude, have fun and just be cautious and do things right! :)



	oyrocks 👤👤🐱		
8 7	darren.boy Darren Hall	Incomin g	Thanks daddy
8 8	ncboyrock s 🐱👤👤ncb oyrocks 👤👤🐱	Outgoin g	Mmm fav video of what exactly? Porn or vids people send on kik?
8 9	darren.boy Darren Hall	Incomin g	Either
9 0	darren.boy Darren Hall	Incomin g	Have any little boys sent you vids recently? I wanna see
9 1	ncboyrock s 🐱👤👤ncb oyrocks 👤👤🐱	Outgoin g	Ok mmm i love the creampie orgy
9 2	ncboyrock s 🐱👤👤ncb oyrocks 👤👤🐱	Outgoin g	Gay vids.
9 3	ncboyrock s 🐱👤👤ncb oyrocks 👤👤🐱	Outgoin g	How young do you like btw?
9 4	ncboyrock s 🐱👤👤ncb oyrocks 👤👤🐱	Outgoin g	And no usually i don't get much vids at all
9 5	darren.boy Darren Hall	Incomin g	I go as low as 5 but my ideal is probably 7 or 8
9 6	ncboyrock s 🐱👤👤ncb oyrocks 👤👤🐱	Outgoin g	Vids on here a guy fucking so hard someone else that it got blood in the cock and it looked hot it just turned me on he just kept doing it and looked like a real good penetration

97	ncboyrock s    ncb oyrocks   	Outgoing	Ok about the same like you for young guys
98	ncboyrock s    ncb oyrocks   	Outgoing	For vids on here the link was deleted ./ but it was a young boy probably 3 yrs old and a guy probably his dad would jerk in the boy mouth and the boy liked opening his mouth v
99	ncboyrock s    ncb oyrocks   	Outgoing	For vids on here the link was deleted ./ but it was a young boy probably 3 yrs old and a guy probably his dad would jerk in the boy mouth and the boy liked opening his mouth very wide and you could see how much he enjoyed eating cum already
100	ncboyrock s    ncb oyrocks   	Outgoing	I found that vid hot to be honest 
101	ncboyrock s    ncb oyrocks   	Outgoing	I like incest. You?
102	darren.boy Darren Hall	Incoming	Sounds awesome
103	darren.boy Darren Hall	Incoming	I'm fine with it it doesn't really get me going tho
104	darren.boy Darren Hall	Incoming	Depends how hot they are
105	ncboyrock s    ncb oyrocks   	Outgoing	True
106	darren.boy Darren Hall	Incoming	I see videos of really really young bugs getting fucked in the butt and they're moaning and you can see the cock going through them


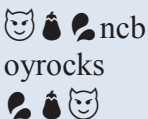
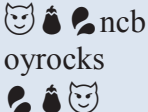
1 0 7	darren.boy Darren Hall	Incomin g	I wouldn't wanna do that but I like boys who are that crazy 😏
1 0 8	darren.boy Darren Hall	Incomin g	*boys
1 0 9	ncboyrock s 😏👤👤ncb oyrocks 👤👤😏	Outgoin g	I agree i found it hot too to see naughty boys
1 1 0	darren.boy Darren Hall	Incomin g	If you ever drive up to Virginia I can suck your dick while we watch those
1 1 1	ncboyrock s 😏👤👤ncb oyrocks 👤👤😏	Outgoin g	Ok ;) haha
1 1 2	ncboyrock s 😏👤👤ncb oyrocks 👤👤😏	Outgoin g	Where in VA are you btw?
1 1 3	darren.boy Darren Hall	Incomin g	Cville
1 1 4	ncboyrock s 😏👤👤ncb oyrocks 👤👤😏	Outgoin g	Nice
1 1 5	ncboyrock s 😏👤👤ncb oyrocks 👤👤😏	Outgoin g	I actually have a friend in that area. Cool to know you live there as well! ;)
1 1 6	ncboyrock s 😏👤👤ncb oyrocks 👤👤😏	Outgoin g	Have snapchat? ncboyrocks  If you ever want to exchange face pic there and no screenshots or get blocked!

1 1 7	ncboyrock s 🐱🐱🐱ncb oyrocks 🐱🐱🐱	Outgoin g	I have to leave now so chat later! ;)
1 1 8	darren.boy Darren Hall	Incomin g	Alright, I pretty much only use kik for this smut tho 😊
1 1 9	darren.boy Darren Hall	Incomin g	And I delete my account a lot but I'll usually get back to you
1 2 0	ncboyrock s 🐱🐱🐱ncb oyrocks 🐱🐱🐱	Outgoin g	Ok 🐱
1 2 1	ncboyrock s 🐱🐱🐱ncb oyrocks 🐱🐱🐱	Outgoin g	Have fun!
1 2 2	darren.boy Darren Hall	Incomin g	🐱
1 2 3	darren.boy Darren Hall	Incomin g	Hey got any more links?
1 2 4	ncboyrock s 🐱🐱🐱ncb oyrocks 🐱🐱🐱	Outgoin g	Unfortunately no
1 2 5	ncboyrock s 🐱🐱🐱ncb oyrocks 🐱🐱🐱	Outgoin g	Most people have about the same vids
1 2 6	darren.boy Darren Hall	Incomin g	Could you sent me the ones I sent you? I deleted mine

1	ncboyrock	Outgoing	Links:
2	s		<a href="https://www.dropbox.com/sh/gkc6ahwwsviqmyk/AABw_LYNWvyKGwtNgYvXoSmXa">https://www.dropbox.com/sh/gkc6ahwwsviqmyk/AABw_LYNWvyKGwtNgYvXoSmXa</a>
7	  ncb oyrocks   		<a href="https://www.dropbox.com/sh/uniyzwueiqmgrcu/AAAjD3IbFD2nl4hoHpTQV9GUa?dl=0">https://www.dropbox.com/sh/uniyzwueiqmgrcu/AAAjD3IbFD2nl4hoHpTQV9GUa?dl=0</a>  <a href="https://www.dropbox.com/sh/6wkuecjwq62k7js/AAB7UuYbQMocYwGMkZNL9wPya/">https://www.dropbox.com/sh/6wkuecjwq62k7js/AAB7UuYbQMocYwGMkZNL9wPya/</a>  <a href="https://www.dropbox.com/sh/u8j1t65u16wwu6k/AABPCq2Bz1NJ2ZDFGB9eE956a/?dl=0">https://www.dropbox.com/sh/u8j1t65u16wwu6k/AABPCq2Bz1NJ2ZDFGB9eE956a/?dl=0</a>  <a href="https://www.dropbox.com/sh/7ojzo1y7e89yhja/AAAtbMWIW29ACZHqGsfRcaFKa?dl=0">https://www.dropbox.com/sh/7ojzo1y7e89yhja/AAAtbMWIW29ACZHqGsfRcaFKa?dl=0</a>  <a href="https://www.dropbox.com/sh/9jb1e6llmmrgkjc/AABNsf-_mbhGtan9u5nUCpUPa?dl=0">https://www.dropbox.com/sh/9jb1e6llmmrgkjc/AABNsf-_mbhGtan9u5nUCpUPa?dl=0</a>  <a href="https://www.dropbox.com/sh/eh2spk4ocddkjpn/AAD4SRQvPgZibMGF1soPp-pBa?dl=0">https://www.dropbox.com/sh/eh2spk4ocddkjpn/AAD4SRQvPgZibMGF1soPp-pBa?dl=0</a>
			Links set 2:
			st <a href="https://www.dropbox.com/sh/r0k8u2r42j4124z/AADs9JrHpgMIWlodWlyb4klRa?dl=">https://www.dropbox.com/sh/r0k8u2r42j4124z/AADs9JrHpgMIWlodWlyb4klRa?dl=</a>
			Vladik <a href="https://yadi.sk/a/HUXIQK-fzqagN">https://yadi.sk/a/HUXIQK-fzqagN</a>
			Msc YT <a href="https://www.dropbox.com/sh/pbpv0k0qwk8scv4/AADcc2R72Aizi2MqaLhCYkira">https://www.dropbox.com/sh/pbpv0k0qwk8scv4/AADcc2R72Aizi2MqaLhCYkira</a>
			Boys <a href="https://www.dropbox.com/sh/m0d1s8umch9ypje/AADkINN9SKDRWXpAb_XIV54Ga?dl=0">https://www.dropbox.com/sh/m0d1s8umch9ypje/AADkINN9SKDRWXpAb_XIV54Ga?dl=0</a>

			<p>Hh  <a href="https://www.dropbox.com/sh/h5qs8mr7kqi4d9g/AADh2RCISx1jmQM2DtQH5eTQa?dl=0">https://www.dropbox.com/sh/h5qs8mr7kqi4d9g/AADh2RCISx1jmQM2DtQH5eTQa?dl=0</a></p> <p>afhjk  <a href="https://www.dropbox.com/sh/tz1nk2g76npp8by/AABDSKQRUQinChNvpDKX6BN8a?dl=0">https://www.dropbox.com/sh/tz1nk2g76npp8by/AABDSKQRUQinChNvpDKX6BN8a?dl=0</a></p> <p>Links 3:</p> <p><a href="https://www.dropbox.com/sh/cw5g5wv77ah2hpz/AADBovFTc2cNXL0oHCM1qQJwa?dl=0">https://www.dropbox.com/sh/cw5g5wv77ah2hpz/AADBovFTc2cNXL0oHCM1qQJwa?dl=0</a></p> <p>Wow!!!  <a href="https://marketing.dropbox.com/sh/%3Aatkey/%3Asecure_hash/%2Apath?referrer=https%3A%2F%2Fkik.com%2F">https://marketing.dropbox.com/sh/%3Aatkey/%3Asecure_hash/%2Apath?referrer=https%3A%2F%2Fkik.com%2F</a></p> <p>Check it out:  <a href="https://www.dropbox.com/sh/7gwwpxwmh3batd6/AAAEeMKBS7BU2HeJuXttB3glma?dl=0">https://www.dropbox.com/sh/7gwwpxwmh3batd6/AAAEeMKBS7BU2HeJuXttB3glma?dl=0</a></p> <p>Links set 4:</p> <p><a href="https://www.dropbox.com/sh/v0w21ldwpj5660w/AABSsILxS4jWrAJ_nlhR3IVKa?dl=0">https://www.dropbox.com/sh/v0w21ldwpj5660w/AABSsILxS4jWrAJ_nlhR3IVKa?dl=0</a></p> <p><a href="https://www.dropbox.com/sh/5mhlw575d1y579o/AAA_kxaLgIxiBxPwUBApgVOna?dl=0">https://www.dropbox.com/sh/5mhlw575d1y579o/AAA_kxaLgIxiBxPwUBApgVOna?dl=0</a></p> <p><a href="https://www.dropbox.com/sh/0cruscn2d41hvfq9/AABbVj1Kk4h3JxbqmFww-L5ca?dl=0">https://www.dropbox.com/sh/0cruscn2d41hvfq9/AABbVj1Kk4h3JxbqmFww-L5ca?dl=0</a></p> <p><a href="https://www.dropbox.com/sh/tq2ld8f18v0e9ig/AABY49_mBNY5CzkEpL1m_JJ6a?dl=0">https://www.dropbox.com/sh/tq2ld8f18v0e9ig/AABY49_mBNY5CzkEpL1m_JJ6a?dl=0</a></p> <p><a href="https://www.dropbox.com/sh/7lr25w5mlbf6yzx/AACs-odVY1dlUZMo9jkw1pEBa?dl=0">https://www.dropbox.com/sh/7lr25w5mlbf6yzx/AACs-odVY1dlUZMo9jkw1pEBa?dl=0</a></p> <p><a href="https://www.dropbox.com/sh/hck96sjqugiqrm5/AACxqIqTPUtJnCddw_OBIL6Sa?dl=0">https://www.dropbox.com/sh/hck96sjqugiqrm5/AACxqIqTPUtJnCddw_OBIL6Sa?dl=0</a></p> <p><a href="https://www.dropbox.com/sh/nc6qv8wfxpqiy7g/AAAHfnqrEwUSi38nXYMtQID-a?dl=0">https://www.dropbox.com/sh/nc6qv8wfxpqiy7g/AAAHfnqrEwUSi38nXYMtQID-a?dl=0</a></p>
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			<a href="https://www.dropbox.com/sh/8cbovyw63zww0ih/AAATov0xJh1jsPUVHJWaviCBa?dl=0">https://www.dropbox.com/sh/8cbovyw63zww0ih/AAATov0xJh1jsPUVHJWaviCBa?dl=0</a>  <a href="https://www.dropbox.com/sh/d3tr6656vwbqjtn/AADA6W0RgbaqONPPaNKZwmdoa?dl=0">https://www.dropbox.com/sh/d3tr6656vwbqjtn/AADA6W0RgbaqONPPaNKZwmdoa?dl=0</a>  <a href="https://www.dropbox.com/sh/6zpjsswp9y36dig/AAC12XCjCf9_RFhqGWtITGkoa?dl=0">https://www.dropbox.com/sh/6zpjsswp9y36dig/AAC12XCjCf9_RFhqGWtITGkoa?dl=0</a>
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1 2 9	darren.boy Darren Hall	Incomin g	
1 3 0	ncboyrock s 	Outgoin g	Have fun! ;)
1 3 1	ncboyrock s 	Outgoin g	If you get anything new would be cool if you shared :)

27. A subpoena return from Kik showed that Kik user “darren.boy” had an unverified registration email address of [darrenhall28@aol.com](mailto:darrenhall28@aol.com) and accessed the account on September 28, 2017 from an IP address owned by Century Link of 184.0.211.249.

28. The Century Link associated with that IP address had the billing name of David and Brooke Correll. Further investigation revealed that ROY CHAPMAN CORRELL (hereafter “SUBJECT 2”), their son, was 19 years old at the time of the above Kik messages (the age “darren.boy” claimed to be in the above Kik messages).

29. In April of 2019, your Affiant learned from Verizon that SUBJECT 2’s PHONE utilized IMEI 354839093242769, 359301063468135, and 359236061276611 from May 8, 2015 to the present time when processed in April of 2019. Your affiant also learned that SUBJECT 2’S PHONE has the telephone number 434-466-3995.

30. The Dropbox links sent and received by Kik user “darren.boy” in the exchange above with “ncboyrocks” were reviewed by your Affiant through search warrant returns from Dropbox. The aforementioned links were observed to contain approximately 1,000 images to include videos of child exploitative material (CEM).

31. A review of the above images and videos revealed sexually suggestive poses and/or



acts that involved toddlers and infants.

32. I know from my training and experience that both Dropbox and Kik are often accessed from cellular phones and that collectors of child pornography often use cellular phones to access and store CEM.

**COMPUTERS, CELLULAR DEVICES, ELECTRONIC STORAGE, AND FORENSIC  
ANALYSIS**

33. As described above and in Attachment B, this application seeks permission to search for electronic records that might be found on the SUBJECT PHONE, in whatever form they are found. Thus, the warrant applied for would authorize the seizure of electronic storage media or, potentially, the copying of electronically stored information, all under Rule 41(e)(2)(B).

34. *Probable cause.* I submit that there is probable cause to believe those records will be stored on the SUBJECT PHONE for at least the following reasons:

- a. Based on my knowledge, training, and experience, I know that computer files or remnants of such files can be recovered months or even years after they have been downloaded onto a storage medium, deleted, or viewed via the Internet.  
  
Electronic files downloaded to a storage medium can be stored for years at little or no cost. Even when files have been deleted, they can be recovered months or years later using forensic tools. This is so because when a person “deletes” a file on a computer, the data contained in the file does not actually disappear; rather, that data remains on the storage medium until it is overwritten by new data.

- b. Therefore, deleted files, or remnants of deleted files, may reside in free space or slack space—that is, in space on the storage medium that is not currently being used by an active file—for long periods of time before they are overwritten. In addition, a computer’s operating system may also keep a record of deleted data in a “swap” or “recovery” file.
- c. Wholly apart from user-generated files, computer storage media—in particular, computers’ internal hard drives—contain electronic evidence of how a computer has been used, what it has been used for, and who has used it. To give a few examples, this forensic evidence can take the form of operating system configurations, artifacts from operating system or application operation, file system data structures, and virtual memory “swap” or paging files. Computer users typically do not erase or delete this evidence, because special software is typically required for that task. However, it is technically possible to delete this information.
- d. Similarly, files that have been viewed via the Internet are sometimes automatically downloaded into a temporary Internet directory or “cache.”

35. *Forensic evidence.* As further described in Attachment B, this application seeks permission to locate not only computer files that might serve as direct evidence of the crimes described on the warrant, but also for forensic electronic evidence that establishes how computers were used, the purpose of their use, who used them, and when. There is probable cause to believe that this forensic electronic evidence will be on the SUBJECT PHONE because:

- a. Data on the storage medium can provide evidence of a file that was once on the storage medium but has since been deleted or edited, or of a deleted portion of a file (such as a paragraph that has been deleted from a word processing file).

Virtual memory paging systems can leave traces of information on the storage medium that show what tasks and processes were recently active. Web browsers, e-mail programs, and chat programs store configuration information on the storage medium that can reveal information such as online nicknames and passwords. Operating systems can record additional information, such as the attachment of peripherals, the attachment of USB flash storage devices or other external storage media, and the times the computer was in use. Computer file systems can record information about the dates files were created and the sequence in which they were created, although this information can later be falsified.

- b. As explained herein, information stored within a computer, cellular, and other electronic storage media may provide crucial evidence of the “who, what, why, when, where, and how” of the criminal conduct under investigation, thus enabling the United States to establish and prove each element or alternatively, to exclude the innocent from further suspicion. In my training and experience, information stored within a computer or storage media (e.g., registry information, communications, images and movies, transactional information, records of session times and durations, internet history, and anti-virus, spyware, and malware detection programs) can indicate who has used or controlled the computer, cellular, or storage media. This “user attribution” evidence is

analogous to the search for “indicia of occupancy” while executing a search warrant at a residence. The existence or absence of anti-virus, spyware, and malware detection programs may indicate whether the computer was remotely accessed, thus inculcating or exculpating the computer owner. Further, computer and storage media activity can indicate how and when the computer or storage media was accessed or used. For example, as described herein, computers typically contain information that log: computer user account session times and durations, computer activity associated with user accounts, electronic storage media that connected with the computer, and the IP addresses through which the computer accessed networks and the internet. Such information allows investigators to understand the chronological context of computer or electronic storage media access, use, and events relating to the crime under investigation. Additionally, some information stored within a computer or electronic storage media may provide crucial evidence relating to the physical location of other evidence and the suspect. For example, images stored on a computer may both show a particular location and have geolocation information incorporated into its file data. Such file data typically also contains information indicating when the file or image was created. The existence of such image files, along with external device connection logs, may also indicate the presence of additional electronic storage media (e.g., a digital camera or cellular phone with an incorporated camera). The geographic and timeline information described herein may either inculcate or exculpate the computer user. Last, information stored within a computer may provide relevant insight into the computer user’s state of mind as it

relates to the offense under investigation. For example, information within the computer may indicate the owner's motive and intent to commit a crime (e.g., internet searches indicating criminal planning), or consciousness of guilt (e.g., running a "wiping" program to destroy evidence on the computer or password protecting/encrypting such evidence in an effort to conceal it from law enforcement).

- c. A person with appropriate familiarity with how a computer works can, after examining this forensic evidence in its proper context, draw conclusions about how computers were used, the purpose of their use, who used them, and when.
- d. The process of identifying the exact files, blocks, registry entries, logs, or other forms of forensic evidence on a storage medium that are necessary to draw an accurate conclusion is a dynamic process. While it is possible to specify in advance the records to be sought, computer evidence is not always data that can be merely reviewed by a review team and passed along to investigators. Whether data stored on a computer is evidence may depend on other information stored on the computer and the application of knowledge about how a computer behaves. Therefore, contextual information necessary to understand other evidence also falls within the scope of the warrant.
- e. Further, in finding evidence of how a computer was used, the purpose of its use, who used it, and when, sometimes it is necessary to establish that a particular thing is not present on a storage medium. For example, the presence or absence of counter-forensic programs or anti-virus programs (and associated data) may be relevant to establishing the user's intent.

- f. I know that when an individual uses a computer to distribute or download CEM, the individual's computer will generally serve both as an instrumentality for committing the crime, and also as a storage medium for evidence of the crime. The computer is an instrumentality of the crime because it is used as a means of committing the criminal offense. The computer is also likely to be a storage medium for evidence of crime. From my training and experience, I believe that a computer used to commit a crime of this type may contain: data that is evidence of how the computer was used; data that was sent or received; notes as to how the criminal conduct was achieved; records of Internet discussions about the crime; and other records that indicate the nature of the offense.

36. *Necessity of seizing or copying entire computers, cellular, or storage media.* In most cases, a thorough search of a premises for information that might be stored on storage media often requires the seizure of the physical storage media and later off-site review consistent with the warrant. In lieu of removing storage media from the premises, it is sometimes possible to make an image copy of storage media. Generally speaking, imaging is the taking of a complete electronic picture of the computer's data, including all hidden sectors and deleted files. Either seizure or imaging is often necessary to ensure the accuracy and completeness of data recorded on the storage media, and to prevent the loss of the data either from accidental or intentional destruction. This is true because of the following:

- a. The time required for an examination. As noted above, not all evidence takes the form of documents and files that can be easily viewed on site. Analyzing evidence of how a computer has been used, what it has been used for, and who has used it requires considerable time, and taking that much time on premises

could be unreasonable. As explained above, because the warrant calls for forensic electronic evidence, it is exceedingly likely that it will be necessary to thoroughly examine storage media to obtain evidence. Storage media can store a large volume of information. Reviewing that information for things described in the warrant can take weeks or months, depending on the volume of data stored, and would be impractical and invasive to attempt on-site.

- b. Technical requirements. Computers can be configured in several different ways, featuring a variety of different operating systems, application software, and configurations. Therefore, searching them sometimes requires tools or knowledge that might not be present on the search site. The vast array of computer hardware and software available makes it difficult to know before a search what tools or knowledge will be required to analyze the system and its data on the Premises. However, taking the storage media off-site and reviewing it in a controlled environment will allow its examination with the proper tools and knowledge.
- c. Variety of forms of electronic media. Records sought under this warrant could be stored in a variety of storage media formats that may require off-site reviewing with specialized forensic tools.

37. *Nature of examination.* Based on the foregoing, and consistent with Rule 41(e)(2)(B), the warrant I am applying for would permit seizing, imaging, or otherwise copying storage media that reasonably appear to contain some or all of the evidence described in the warrant, and would authorize a later review of the media or information consistent with the warrant. The later review may require techniques, including but not limited to computer-assisted

scans of the entire medium, that might expose many parts of a hard drive to human inspection in order to determine whether it is evidence described by the warrant.

**AUTHORIZATION FOR FINGERPRINT UNLOCK OF APPLE IPHONE**

38. As described in Attachment A, the SUBJECT PHONE is an Apple brand device, specifically an Apple iPhone X.

39. I know from my training and experience, as well as from information found in publicly available materials including those published by Apple, that some models of Apple devices such as iPhones and iPads offer their users the ability to unlock the device via the use of a fingerprint or thumbprint (collectively, “fingerprint”) in lieu of a numeric or alphanumeric passcode or password. This feature is called Touch ID.

40. If a user enables Touch ID on a given Apple device, he or she can register up to 5 fingerprints that can be used to unlock that device. The user can then use any of the registered fingerprints to unlock the device by pressing the relevant finger(s) to the device’s Touch ID sensor, which is found in the round button (often referred to as the “home” button) found at the bottom center of the front of the device. In my training and experience, users of Apple devices that offer Touch ID often enable it because it is considered to be a more convenient way to unlock the device than by entering a numeric or alphanumeric passcode or password, as well as a more secure way to protect the device’s contents. This is particularly true when the user(s) of the device are engaged in criminal activities and thus have a heightened concern about securing the contents of the device.

41. In some circumstances, a fingerprint cannot be used to unlock a device that has Touch ID enabled, and a passcode or password must be used instead. These circumstances include: (1) when more than 48 hours has passed since the last time the device was unlocked and



(2) when the device has not been unlocked via Touch ID in 8 hours and the passcode or password has not been entered in the last 6 days. Thus, in the event law enforcement encounters a locked Apple device, the opportunity to unlock the device via Touch ID exists only for a short time. Touch ID also will not work to unlock the device if (1) the device has been turned off or restarted; (2) the device has received a remote lock command; and (3) five unsuccessful attempts to unlock the device via Touch ID are made.

42. The passcode or password that would unlock the SUBJECT PHONE is not known to law enforcement. Thus, it will likely be necessary to press the finger(s) of the user(s) of the SUBJECT PHONE to the device's Touch ID sensor in an attempt to unlock the device for the purpose of executing the search authorized by this warrant. Attempting to unlock the relevant Apple device(s) via Touch ID with the use of the fingerprints of the user(s) is necessary because the government may not otherwise be able to access the data contained on those devices for the purpose of executing the search authorized by this warrant.

43. As previously stated, 434-466-3995 has been identified by Verizon and your Affiant as the SUBJECT PHONE per legal process. It is believed by law enforcement that SUBJECT 2 will be in possession of this phone number, to include any of the aforementioned IMEIs. Based on these facts and my training and experience, it is likely that SUBJECT 2 is the one user of the SUBJECT PHONE and thus that his fingerprints are among those that are able to unlock the device via Touch ID.

44. Although I do not know which of a given user's 10 fingerprints is capable of unlocking a particular device, based on my training and experience I know that it is common for a user to unlock a Touch ID-enabled Apple device via the fingerprints on thumbs or index fingers. In the event that law enforcement is unable to unlock the SUBJECT PHONE as

described above within the five attempts permitted by Touch ID, this will simply result in the device requiring the entry of a password or passcode before it can be unlocked.

45. Due to the foregoing, I request that the Court authorize law enforcement to press the fingers (including thumbs) of SUBJECT 2 to the Touch ID sensor of the SUBJECT PHONE for the purpose of attempting to unlock the device via Touch ID in order to search the contents as authorized by this warrant.

### **CONCLUSION**

46. I am investigating SUBJECT 2 for distribution, receipt, and possession of child pornography and I have probable cause to believe that contraband and evidence of a crime, fruits of a crime, and instrumentalities of violations of Title 18, United States Code, Sections 2252A(a)(2)(A) and 2252A(a)(5)(B) are located within the SUBJECT PHONE. Your Affiant also seeks to obtain those items described in Attachment B for the purpose of obtaining potential evidence and contraband of CEM that is stored or located on SUBJECT PHONE.

### **OATH**

The information in this affidavit is true to the best of my knowledge and belief.

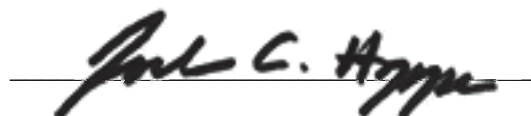
Respectfully submitted,

*s/David Wolf*

David Wolf, Special Agent  
Federal Bureau of Investigation

Received by reliable electronic means and sworn and attested to by telephone on this

24<sup>th</sup> day of July, 2019.

A handwritten signature in black ink, appearing to read "Paul C. Hays", is written over a horizontal line.

HONORABLE JOEL C. HOPPE  
UNITED STATES MAGISTRATE JUDGE